

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

SHERESE RAINEY)	
)	
Plaintiff,)	
)	
vs.)	Cause No.:
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

COMPLAINT

COMES NOW, Plaintiff Sherese Rainey, by and through her attorney, Jarrod P. Beasley, of Kuehn, Beasley and Young and for her Complaint against the United States of America, states as follows:

(Count I – Federal Tort Claims Act)

1. Plaintiff is and was at all relevant times a resident of St. Clair County, Illinois.
2. On or about January 7, 2020, Plaintiff was involved in a motor vehicle accident with United States Postal Service driver Charlie Cole.
3. Plaintiff's vehicle was hit while Charlie Cole was in the scope of his employment.
4. At all relevant times, United States of America had a duty to exercise reasonable care in the maintenance and operation of his vehicle.
5. That at the above-mentioned time and place, United States of America was negligent in one or more of the following ways:

- a. Failed to reduce speed in order to avoid an accident;
 - b. Failed to keep a proper lookout in order to avoid an accident; and
 - c. Failed to exercise reasonable care in operating his motor vehicle.
6. That as a direct and proximate result of one or more of these negligent acts, Plaintiff was injured.
7. That Plaintiff has suffered, and will suffer in the future, severe injury and pain, lost enjoyment of life, pain and suffering and disability as a result of United States of America's negligence.
8. Plaintiff submitted her claim to the United States of America on December 10, 2021 per the Statute via Form 95.
9. That more than six (6) months have elapsed since the submission of said claim.

WHEREFORE, Plaintiff prays for judgment against the Defendant, United States of America, in an amount greater than FIFTY THOUSAND DOLLARS (\$50,000.00), plus costs.

Respectfully Submitted,

/s Jarrod P. Beasley

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